

**FORM
INSP**

Rev
X/20

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

12/05/2023

Submitted Date:

12/06/2023

Document Number:

710100107

FIELD INSPECTION FORM

Loc ID 318400 Inspector Name: Anderson, Laurel On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

OGCC Operator Number: 46290
Name of Operator: KP KAUFFMAN COMPANY INC
Address: 1700 LINCOLN ST STE 4550
City: DENVER State: CO Zip: 80203

Findings:

- 14 Number of Comments
- 9 Number of Corrective Actions
- Corrective Action Response Requested

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Motisi, Dan		dmotisi@kpk.com	KP Kauffman - Environmental Geologist
Graber, Nikki		nikki.graber@state.co.us	
Kauffman, KPK		cogcc@kpk.com	All Inspections
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Peterson, John	303-550-8872	jpeter@kpk.com	Director EHS & Compliance
Watzman, Ross	(303) 825-4822	rwatzman@kpk.com	all inspections.

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
241230	WELL	SI	08/01/2023	OW	123-09018	UPRR 43 PAN AM B 7	SI
318400	LOCATION	AC			-	UPRR 43 PAN AM B-61N68W 3NWNW	AC
475436	OFF-LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line 3NWNW	AC
475437	OFF-LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line 3NWNW	AC
475438	OFF-LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line 3NWNW	AC
475439	OFF-LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line 3NWNW	AC
484038	SPILL OR RELEASE	AC			-	Facility 1 Historical	AC

General Comment:

This is an environmental inspection to document site conditions and remediation progress for:

Spill ID No: 484038

Remediation Project No: 31902

Location ID No 318400

UPRR 43 PAN AM B 7 Well - API: 123-09018

Any corrective actions from previous inspections, comments/conditions of approval from previously denied/approved forms that have not been addressed remain applicable. Operator personnel and a landowner representative were on location at the time of this field inspection. Photos attached to document site conditions.

Incident information: Spill Discovery Date: 3/15/2023

Days open: 266 days

Last Form 19 received: 3/17/2023 - Operator is out of compliance with Rule 912.b.(4) and COAs applied to Form 19 Initial Document #403348902.

Current site status: Multiple excavations open, excavation for historic release (Spill ID 484038) has been backfilled, Operator has not submitted any Forms (Form 19/Form 27s) for this spill as required by Rule and previous CAs, impacts to soil and groundwater have been documented by a third party contractor (See Doc Nos: 1561572, 1561573, 1561584 - 1561588), impacts reportedly remain in-situ, fencing present, soil stockpiles present throughout the location without BMPs, trash/debris/weeds and various E&P waste were observed throughout the location. Wellhead has been cut and capped, produced water tank and crude oil ASTs have been removed.

Operator personnel were removing flowlines at the time of inspection fluids were observed spilling/previously spilled from the flowlines during removal (see attached photos). A strong odor was noted at the trench where stained soil/spilled fluids were observed. Flowlines were being loaded into a trailer for off-site disposal.

Location

Overall Good:

Emergency Contact Number:

Comment: Sign not legible.

Corrective Action: Comply with Rule 605.g. Date: 12/07/2023

Good Housekeeping:

Type	OTHER		
Comment:	Weeds/stained soil observed throughout the location. Trash, torn/downed construction fencing were observed on location. Broken pieces of fiberglass flowlines were in multiple stockpiles on location without BMPs.		
Corrective Action:	Comply with Rules 606., 902.c., and 1002.f.(2)D and 1003.f.	Date:	12/26/2023

Overall Good:

Spills:

Type	Area	Volume	
PW/CO	Flow Line		
Comment:	Operator personnel were observed excavating, cutting flowlines and loading fiberglass flowlines into a trailer for off-site disposal. Fluids from flowlines were observed on the ground and within the trench during flowline removal activities. Additional fluids were observed actively spilling from flowlines during removal activities at the time of inspection.		
Corrective Action:	Operator shall properly handle, transport and dispose of E&P waste in accordance with 905.b., 905.e., 905.f. and attach all waste manifests to the next Supplemental Form 27 per Rule 905.b.(3). Remove free fluids and provide documentation of cleanup via Supplemental Form 27.		Date: 12/12/2023

In Containment: No

Comment: _____

Multiple Spills and Releases?

Fencing/:

Type	OTHER		
Comment:	Inadequate fencing around open excavations.		
Corrective Action:	Operator shall immediately install, repair and maintain best management practices to protect the environment, public health, safety and welfare and the environment as required by Rule 913.b.(5)B.i and ECOM Guidance 913.b.(5)B i-v which requires fencing used be appropriate to site conditions, ie: nearby residences, depth of excavation, presence of ground or surface water, livestock, wind, etc.		Date: 12/06/2023

Equipment:

Type: Flow Line	#		corrective date
Comment:	Multiple flowlines are exposed in the open excavations.		
Corrective Action:	These flowlines must be abandoned per Rule 1105. (open flowline cut ends must be sealed per 1105.e.4).		Date: 01/02/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
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Comment:	
Corrective Action:	Date:

Inspected Facilities

Facility ID: <u>241230</u>	Type: <u>WELL</u>	API Number: <u>123-09018</u>	Status: <u>SI</u>	Insp. Status: <u>SI</u>
Facility ID: <u>318400</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>
Facility ID: <u>475436</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>
Facility ID: <u>475437</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>
Facility ID: <u>475438</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>
Facility ID: <u>475439</u>	Type: <u>OFF-</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>
Facility ID: <u>484038</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>AC</u>

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Excavation related to Spill ID No. 484038 (documented in previous inspections Doc #689501427 and Doc #691201675) has been backfilled and associated impacted soil previously stockpiled on location has been removed). Site assessments conducted by 3rd Party contractor documents impacts to soil and groundwater discovered at this location. Last report: 3/17/2023 Operator is out of compliance with Rule 912.b.(4) and COAs applied to Form 19 Initial Document #403348902.

Corrective Action: A supplemental Form 19 was required by 3/25/2023. Date: 03/25/2023

Reportable: YES GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)	
	Comment				
	Corrective Action				Date: <u> </u>
	Comment Unmarked, unlined soils pile on location with inadequate BMPs.				
	Corrective Action Manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v.				Date: <u> </u>

Spill/Remediation:

Comment: Spill ID 484038 remains open; date of discovery 3/15/2023.

Corrective Action: Per ECMC Inspection Doc #689501427: "Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i-iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director." Date: 06/13/2023

Emission Control Burner (ECB): _____

Comment:

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Unmarked, unlined soils pile on location with inadequate BMPs.

Corrective Action: Manage waste in compliance with Rule 913.b.iv and ECMC Guidance 913.b.(5)B i-v.

Date: 12/05/2023

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
710100108	Photo Documentation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347968